

REMARKS

Claims 1-4, 6-17, 19 and 21-25 were rejected under 35 U.S.C. § 102 as being anticipated by Venkateswar (US 5,721,622). Claims 1-25 were rejected under 35 U.S.C. § 102 as being anticipated by Sandstrom (US 6,618,185). These rejections are overcome for the exemplary reasons set forth below.

A cited prior art reference anticipates the claimed invention under 35 U.S.C. § 102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. MPEP § 2131; *In re Bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir. 1990). Anticipation is only shown where each and every limitation of the claimed invention is found in a single cited prior art reference. MPEP § 2131; *In re Donohue*, 766 F.2d 531, 534, 226 U.S.P.Q. 619, 621 (Fed. Cir. 1985).

Claims 1-25 recite, as exemplified in Claim 11: “*a first set of said light modulation elements operable to photolithographically transfer a portion of an image onto an area of a substrate, and a second set of said light modulation elements operable to photolithographically transfer the portion of the image onto the area of the substrate.*” This exemplary feature of Claims 1-25 has not been found to be taught in Venkateswar or Sandstrom.

Considering first Venkateswar, this reference discloses that each pixel of any given image line on a printer drum is sequentially exposed by four mirrors. *Venkateswar, Column 5, lines 39-48; and Figures 1 and 3.* Therefore, a given image line on the drum (i.e., a row of pixels extending longitudinally along the drum) is produced by a sequence of four exposures, wherein four rows of mirrors are used, respectively, to make the four exposures of the sequence. *Venkateswar, Column 5, lines 57-63.* Each of the four rows of mirrors transfers a

predetermined image component, referred to as a microimage in Venkateswar, onto a given image line. *Venkateswar, Column 5, lines 53-57; and Column 5, line 64 –Column 6, line 4.*

However, Applicants have not found in Venkateswar any teaching that, for any given image line, one of the four rows of mirrors transfers a microimage onto the image line, and another of the four rows of mirrors transfers the same microimage onto the image line.

Indeed, it appears that each of the four rows of mirrors transfers its own respectively corresponding microimage onto the image line, and that the microimage transferred by any given row of mirrors is a microimage that has been updated with respect to the microimage transferred by the row of mirrors that performed the immediately preceding exposure.

Venkateswar, Column 5, lines 49-50; Column 5, line 64 – Column 6, line 1; and Column 6, lines 5-13. It is submitted in view of the foregoing that Venkateswar fails to teach the aforementioned exemplary feature of Claims 1-25.

Turning now to Sandstrom, this reference discloses that first and second sets of spatial light modulating elements can be used in respective first and second writing passes to perform respectively corresponding image transfers. *Sandstrom, Column 2, lines 57-67; and Column 9, lines 57-64.* However, as seen from Sandstrom Figure 2 and the corresponding description, an image portion (also referred to as a “stamp” in Sandstrom) transferred by the second set of elements during the second writing pass is offset by a predetermined spatial distance from an image portion transferred by the first set of elements during the first writing pass. *Sandstrom, Figure 2; Column 9, lines 42-50; Column 10, lines 32-45.* Sandstrom also states that the images (or stamps) such as shown in Figure 2 represent different patterns. *Sandstrom, Column 9, lines 53-57.*

Accordingly, Sandstrom also does not disclose “a first set of said light modulation elements operable to photolithographically transfer a portion of an image onto an area of a substrate, and a second set of said light modulation elements operable to

photolithographically transfer the portion of the image onto the area of the substrate.”

Sandstrom therefore fails to anticipate the invention recited in Claims 1-25. As demonstrated above, the § 102 rejections of Claims 1-25 are overcome, and withdrawal of these rejections is respectfully requested.

As a result of the foregoing, all Claims in the Application are now believed to be in condition for allowance, and an early allowance of such Claims is respectfully requested. If any issues arise, or if the Examiner has any suggestions for expediting allowance of this Application, the Applicants respectfully invite the Examiner to contact the undersigned at the telephone number or email address indicated below.

Respectfully submitted,

KEN A. NISHIMURA et al

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By Holly L. Rudnick
Holly L. Rudnick
Registration No. 43,065

Garlick, Harrison & Markison, LLP
P.O. Box 670007
Dallas, Texas 75367
(Direct) (214) 387-8097
(Fax) (214) 387-7949
(Email hrudnick@texaspatents.com)